

APPENDIX G
CERTIFICATION FROM EPA THAT THE
COLUMBIA RIDGE LANDFILL IS CERCLA
COMPLIANT

From: [Amy Essig Desai](#)
To: [Elizabeth Appy](#); [Joy Dunay](#); [Evan Malczyk](#)
Cc: [Kimberly Carlton](#)
Subject: FW: Additional Sediment Sampling Waste Disposal
Date: Wednesday, April 06, 2016 10:22:04 AM

Here you go.

From: Chu Rebecca [mailto:Chu.Rebecca@epa.gov]
Sent: Thursday, March 31, 2016 12:52 PM
To: Amy Essig Desai <aedesai@farallonconsulting.com>
Subject: Fw: Additional Sediment Sampling Waste Disposal

FYI

From: Brown, Terry
Sent: Thursday, March 31, 2016 12:49 PM
To: Chu Rebecca
Cc: Lin, Moya
Subject: RE: Additional Sediment Sampling Waste Disposal

Hi Becky - The Clean Harbors Aragonite facility continues to be acceptable pursuant to the CERCLA Off-Site Rule. Here's the newest verification of continued acceptability (VCA):

Because the OSR acceptability status is dynamic in nature and subject to change, Region 8 has instituted a policy that periodically verify, as appropriate, the acceptability of facilities that have been determined to be acceptable. The purpose of the VCA is to ascertain any changes in a facility's compliance status or releases, and to confirm that the facility continues to be acceptable. VCAs are conducted when a request for OSR status is received and the previous VCA had been conducted more than 60 days prior. VCA are valid for 60-days.

A VCA was completed on the Clean Harbors Aragonite facility on March 31, 2016, so the VCA is valid until **May 31, 2016**. VCA are valid for 60-days. CERCLA waste shipments sent to the Aragonite facility up until May 31st are in full compliance with the OSR. If CERCLA wastes are planned to be sent after this date, please contact us about a week or so prior to May 31st, so that a new VCA can be conducted at that time. Thanks.

Terry J. Brown
Regional OSR Coordinator
US EPA Region 8
303-312-6419

From: Chu Rebecca
Sent: Thursday, March 31, 2016 8:51 AM

To: Brown, Terry <Brown.Terry@epa.gov>; Lin, Moya <Lin.Moya@epa.gov>
Subject: Fw: Additional Sediment Sampling Waste Disposal

Hi Terry and Moya

I am an RPM in Region 10, and my PRP wants to send waste to a facility in R8 (Clean Harbors Aragonite Incinerator in Aragonite, Utah). Can you please let me know if this facility is appropriate for the purposes of the Off-Site Rule?

Thank you,

Becky

From: Amy Essig Desai <aedesai@farallonconsulting.com>
Sent: Tuesday, March 29, 2016 9:05 AM
To: Chu Rebecca
Subject: Additional Sediment Sampling Waste Disposal

Becky,

In accordance with Section VIII 21.b. of the Settlement Agreement, EMJ is required to obtain certification from EPA that the proposed receiving facilities are operating in compliance with the requirements of CERCLA Section 121(d)(3); 42 U.S.C. Section 9621 (d)(3); and 40 CFR Section 300.440. Please confirm that the following facilities are operating in compliance with the aforementioned CERCLA requirements.

- Stericycle Environmental Solutions Kent-TSDF in Kent, Washington. Primary receiving facility for all waste materials.
- Columbia Ridge Landfill, in Arlington, Oregon. For non-regulated and RCRA-regulated solids, debris, and solidified liquid materials (sediment, rinse water, PPE).
- US Ecology Idaho Landfill, in Grandview, Idaho. For TSCA-regulated solids (sediments and PPE):
- Clean Harbors Aragonite Incinerator in Aragonite, Utah. For TSCA-regulated liquids (rinse water):

Let me know if you require any additional information.

Thanks,
Amy

Amy Essig Desai | Principal | Farallon Consulting, L.L.C

975 5th Avenue NW | Issaquah, Washington | 98027

Direct: 425.295.0810 | Cell: 425.241.1540



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From: [Amy Essig Desai](#)
To: [Elizabeth Appy](#); [Joy Dunay](#); [Evan Malczyk](#)
Cc: [Teresa C. Michelsen](#)
Subject: FW: Additional Sediment Sampling Waste Disposal
Date: Thursday, March 31, 2016 9:39:08 AM

Fyi. We have approval on 3 of 4. Waiting on the Utah site.

Amy

From: Chu Rebecca [<mailto:Chu.Rebecca@epa.gov>]
Sent: Thursday, March 31, 2016 7:54 AM
To: Amy Essig Desai <aedesai@farallonconsulting.com>
Subject: Re: Additional Sediment Sampling Waste Disposal

I believe so. I am checking with our Region 8 counterparts for the purposes of the offsite rule for the facility in Utah. All of the ones in Region 10 (WA, ID, OR) are acceptable to receive waste.

Becky

From: Amy Essig Desai <aedesai@farallonconsulting.com>
Sent: Tuesday, March 29, 2016 12:01 PM
To: Chu Rebecca
Subject: RE: Additional Sediment Sampling Waste Disposal

Thanks for getting back to me so quickly. Jennifer references a facility in Pennsylvania? Did she mean the Utah site?

From: Chu Rebecca [<mailto:Chu.Rebecca@epa.gov>]
Sent: Tuesday, March 29, 2016 11:59 AM
To: Amy <'aedesai@farallonconsulting.com'>
Subject: FW: Additional Sediment Sampling Waste Disposal

FYI

Rebecca Chu | Remedial Project Manager
United States Environmental Protection Agency
Region 10
1200 Sixth Ave Suite 900
ECL-122
Seattle, WA 98101

(206) 553-1774

Chu.Rebecca@epa.gov

From: Parker, Jennifer

Sent: Tuesday, March 29, 2016 11:54 AM

To: Chu Rebecca <Chu.Rebecca@epa.gov>

Cc: rocrecordsR10 <rocrecordsR10@epa.gov>

Subject: RE: Additional Sediment Sampling Waste Disposal

You submitted a request to the Region 10 Off-Site Rule Contact to find out if Burlington Environmental, LLC, 20245 77th Avenue South Kent, WA (EPA ID# # WAD991281767), US Ecology of Idaho - Site B (RCRA EPA ID # IDD073114654), and Columbia Ridge Landfill (EPA ID # ORD987173457) are acceptable to receive CERCLA waste.

Burlington Environmental, LLC, in Kent, WA (EPA ID # WAD991281767), US Ecology of Idaho - Site B (RCRA EPA ID # IDD073114654), and Columbia Ridge Landfill (EPA ID # ORD987173457) continue to be acceptable to receive CERCLA waste at this time. Please note that an acceptability determination under the Off-Site Rule does not authorize any facility to undertake any waste management practices which have not been previously authorized by permit or regulation and the actual receipt of CERCLA waste by these facilities must be in accordance with all federal, state, local, and any other applicable requirements.

If you make additional plans in the future to ship CERCLA waste to any of these facilities, please check again with the Region 10 Off-Site Rule Contact to ensure that the off-site statuses of the facilities have not changed.

You also asked about a receiving facility in another region. I only have information about receiving facilities in Region 10. You'll need to contact R8 about the facility in Pennsylvania.

<https://www3.epa.gov/epawaste/hazard/wastetypes/wasteid/offsite/index.htm#listnames>

Jennifer Parker

U.S. Environmental Protection Agency, Region 10

Air and RCRA Compliance Unit

1200 Sixth Ave, Suite 900, OCE-101

Seattle, Washington 98101

(206) 553-1900

1-800-424-4EPA

From: Chu Rebecca

Sent: Tuesday, March 29, 2016 10:47 AM

To: Parker, Jennifer <Parker.Jennifer@epa.gov>

Subject: FW: Additional Sediment Sampling Waste Disposal

Jennifer-

Can EMJ, my PRP, send their waste to these facilities?

Becky

Rebecca Chu | Remedial Project Manager
United States Environmental Protection Agency
Region 10
1200 Sixth Ave Suite 900
ECL-122
Seattle, WA 98101
(206) 553-1774
Chu.Rebecca@epa.gov

From: Amy Essig Desai [<mailto:aedesai@farallonconsulting.com>]

Sent: Tuesday, March 29, 2016 9:06 AM

To: Chu Rebecca <Chu.Rebecca@epa.gov>

Subject: Additional Sediment Sampling Waste Disposal

Becky,

In accordance with Section VIII 21.b. of the Settlement Agreement, EMJ is required to obtain certification from EPA that the proposed receiving facilities are operating in compliance with the requirements of CERCLA Section 121(d)(3); 42 U.S.C. Section 9621 (d)(3); and 40 CFR Section 300.440. Please confirm that the following facilities are operating in compliance with the aforementioned CERCLA requirements.

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Let me know if you require any additional information.

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